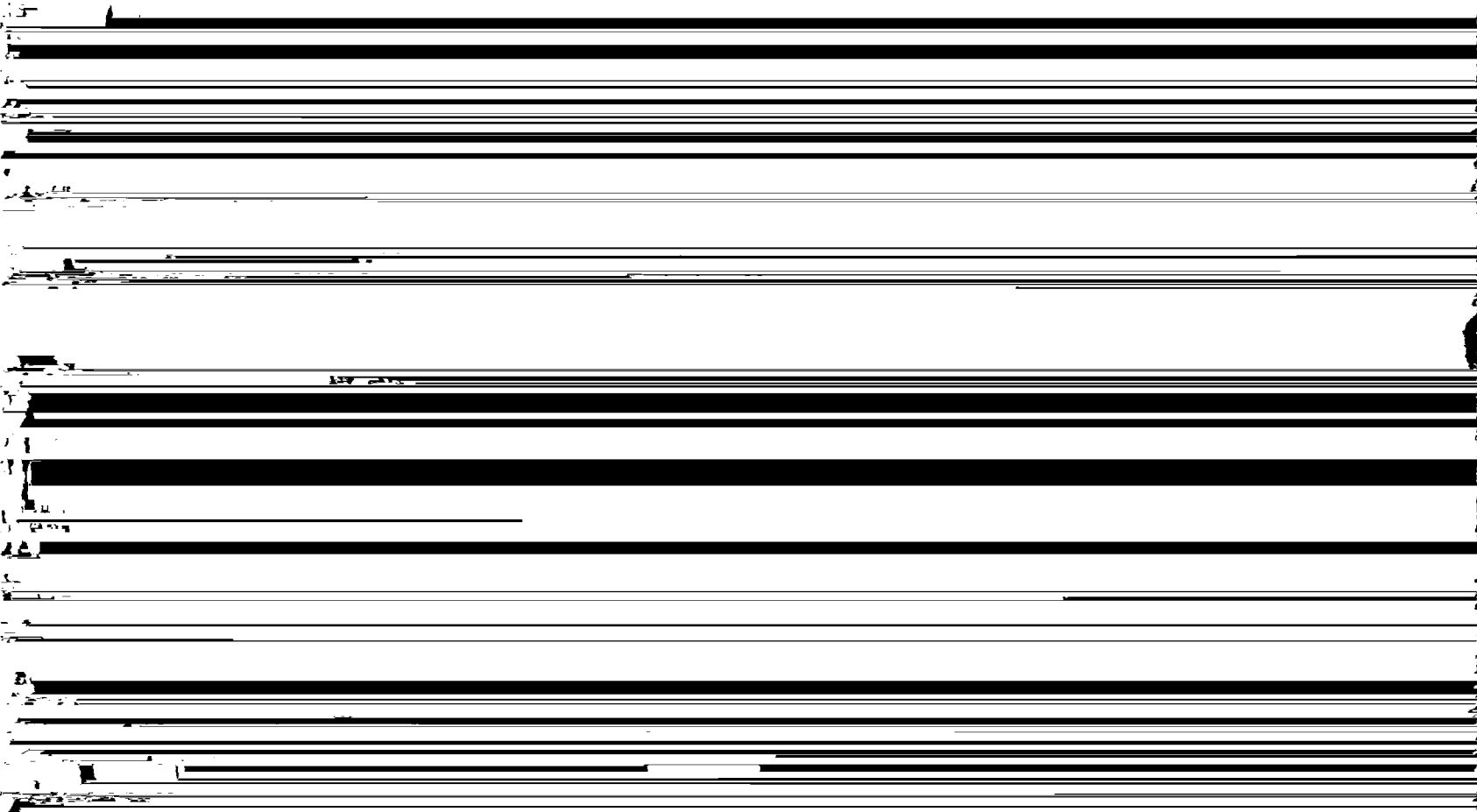



This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There is no handwriting or other markings on the paper.

KNTV's Comments describe five potential sites which ". . . KNTV has identified as the least short-spaced possible alternative transmitter sites to which it might relocate." KNTV Comments, page 7. These sites are located approximately 3.5 to 5.5 miles north to northwest of its present Loma Perietta site. By rough estimate, they would be short-spaced approximately 3 to 4.5 miles from the Channel 11, Willits allotment reference point. This relatively minor degree of short-spacing is appropriate for consideration in the context of a specific rule waiver



". . . in a manner designed to avoid interference to the Willits' allotment." Notice, ¶5. If "equivalent protection" can be provided from a short-spaced site, this is a significant factor in the consideration of any waiver.^{2/} KNTV's response is more a non-answer, than anything else.

Rather than providing specific technical information or engineering analysis with respect to several possible interference avoidance techniques, KNTV does no more than question the appropriateness of having to rely on such techniques, given the relative size of Willits compared to the San Jose metropolitan area. Obviously, significant disparities in relative size do exist. This, however, does not relieve KNTV of the obligation to explore the feasibility of specific interference reduction techniques and provide specific information.

Generalized assertions of a danger of loss of coverage (KNTV Engineering Statement, Exhibit E, page 6-7) are no substitute for specific engineering analysis concerning such matters as the feasibility and effect of directionalization, the use of channel offsets, and possible benefits to be obtained due to terrain shielding effects. These latter two possibilities are not even mentioned, let alone analyzed, by KNTV in its engineering analysis.

^{2/} See Caloosa Television Corp., 3 FCC Rcd 3656, 64 R.R. 2d 1640 (1988).

Whether or not such a showing can be made by KNTV in the context of a specific waiver request is not the issue at this point. What is important, however, is that this is a threshold question to the consideration of more drastic relief such as the complete deletion of another allotment. In the absence of a firm showing that such lesser alternatives are unavailable, the consideration of more drastic alternatives should not be undertaken.

For these reasons, the proposed rulemaking should be promptly terminated. KNTV beyond question has not made the "compelling public interest showing" required to justify the deletion of Channel allotment for which interest has been expressed.^{3/} Nor has it provided sufficient public interest justification to support the substitution of a new UHF channel for the existing Channel 11 allotment at Willits.

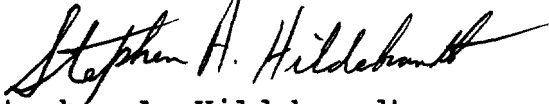
In this latter respect, as requested in Group W's initial comments, this proceeding at the minimum must be stayed pending the finalization of the Commission's ATV allotment plan for the San Francisco area. The Commission simply is not in a position to determine whether a

^{3/} See, Comments of William H. Sauro and Ronna L. Sauro, filed July 19, 1993.

substitute channel can be made available until the ATV
allotment plan is finalized. See Notice, ¶6.

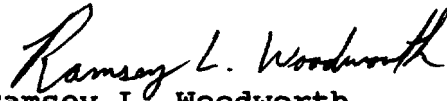
Respectfully submitted,

GROUP W TELEVISION, INC. (CAL.)



Stephen A. Hildebrandt
Chief Counsel

Westinghouse Broadcasting Co., Inc.
1025 Connecticut Avenue, N.W.
Washington, D.C. 20036
(202) 857-1555



Ramsey L. Woodworth
Wilkes, Artis, Hedrick & Lane,
Chartered
1666 K Street, N.W., Suite 1100
Washington, D.C. 20006
(202) 457-7874

Its Counsel

August 3, 1993

CERTIFICATE OF SERVICE

I, Jane Nauman, hereby certify that a copy of the foregoing "Reply Comments" were served on this 3rd day of August, 1993, by first class mail, postage prepaid, to the following:

*Michael C. Ruger, Chief
Allocations Branch, Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
2025 M Street, N.W., Room 8318
Washington, D.C. 20554

*Nancy Joyner
Mass Media Bureau
Federal Communications Commission
2025 M Street, N.W., Room 8314
Washington, D.C. 20554

Tom W. Davidson, Esq.
Paul S. Pien, Esq.
Akin, Gump, Strauss, Hauer & Feld
1333 New Hampshire Avenue, N.W., Suite 400
Washington, D.C. 20036
Counsel for Petitioner


Jane Nauman

*Hand Delivered